START

0014918

HWVP DANGEROUS WASTE PERMIT APPLICATION REVIEW MEETING

ATTENDEES:
S. L. Cross (DOE-RL)
W. D. Cummings (Ecology)
D. L. Duncan (DOE-RL)
C. J. Geier (WHC)
M. T. Gordon (Ecology)
M. T. Jansky (WHC)
M. E. Lerchen (Ecology)
J. H. LaRue (WHC)
T. M. Michelena (Ecology)
J. S. Myers (AG-Ecology)
D. L. Parker (WHC)
S. M. Price (WHC)
S. T. Stites (DOE-RL)

DATE: December 12, 1989

LOCATION: Richland, WA

PURPOSE: Discuss and status items relating to the permitting of the Hanford Waste Vitrification Plant (HWVP). Status the Notice of Deficiency (NOD) resulting from the review by the Washington State Department of Ecology (Ecology) of the HWVP Dangerous Waste Permit Application.

MINUTES:

A Unit Managers' Meeting was held to discuss items relating to the permitting of the HWVP. An agenda for the meeting is attached (Attachment 1), and the main topics of discussion are outlined below.

o NOD Comments. Mr. D. L. Parker told the group that DOE/WHC is still evaluating the NOD comments and is not yet fully prepared to discuss comment responses. Further clarification of specific NOD comments was not requested at this time and no specific comments were discussed.

A proposed schedule for responding to the NOD was discussed. Attendees were advised that the schedule was tentative and had not yet been fully approved. The schedule calls for:

- DOE/WHC to transmit a finalized NOD Response Table to Ecology by February 20, 1990

- Ecology to complete their review of the NOD Response Table by May 22, 1990

- DOE/WHC to complete and submit revised sections of the HWVP Dangerous Waste Permit Application to Ecology within 60 days of the receipt of Ecology review comments on the NOD Response Table (by July 23, 1990, if Ecology review comments are received on May 22, 1990).

In addition, a draft NOD Response Table will be made available for discussion at the next Unit Managers' Meeting (Action Item 1). This will allow NOD responses to be discussed and clarified before being submitted as part of a finalized NOD Response Table. The next Unit Managers' Meeting is scheduled for January 23, 1990 in Lacey, Washington.

o Clean Air Act Permit Application. Ecology has an action to transmit a letter detailing their intention to issue the Clean Air Act (CAA) permit as part of the HWVP Dangerous Waste Permit. This letter is to be prepared and transmitted by December 22, 1989. (Action Item 2).

Ecology asked when the CAA permit application will be submitted to Ecology. Mr. J. H. LaRue responded that the permit application is scheduled to be submitted in April 1990.

o Delay of the Deep Geologic Repository. Ecology discussed their concerns over the delay in opening the geologic repository which will receive vitrified waste from the HWVP. Mr. T. M. Michelena is concerned that the repository may never open and asked what DOE/WHC plans to do in such a case. Ecology feels that DOE/WHC should evaluate alternatives and develop a contingency plan to be used if the repository is not available to receive vitrified waste.

As stated in the NOD, Ecology feels that the vitrified waste will be dangerous waste. Therefore, Ecology is reluctant to support the permitting of a facility which may be producing canisters of dangerous waste with no repository available to receive them. Ecology would like to see an option in the closure plan to be implemented if the geologic repository is not available. The closure plan should identify a plan for clean closure (i.e., sending the canisters to a repository), and also provide an option for closing the facility without sending the canisters to a repository (i.e., with the canisters left in place).

Mr. M. T. Gordon responded to a question by saying that it might be possible to show that the vitrified waste is not a dangerous waste, but the information presented in the permit application is insufficient for that purpose.

o SEPA Checklist. SEPA was not discussed in detail because Mr. Russ Brown, of Ecology, was unable to attend the meeting. Ecology asked when the SEPA Checklist would be submitted to Ecology. Mr. D. L. Duncan responded that the SEPA Checklist is currently being reviewed by DOE-RL and should be submitted to Ecology by December 22, 1989 (Action Item 3).

Mr. Michelena agreed to provide a response to the SEPA Checklist by January 31, 1990 (Action Item 4).

- o Hanford Defense Waste-Environmental Impact Statement. Mr. M. T. Jansky distributed copies of a write-up (Attachment 2) detailing the way in which the Hanford Defense Waste-Environmental Impact Statement (HDW-EIS) has fulfilled SEPA requirements. Mr. Jansky briefly discussed the write-up and asked if Ecology had any specific questions concerning the HDW-EIS. In response to questions from Ecology, Mr. Jansky discussed waste form and treatment alternatives which were examined as part of the HDW-EIS process.

  When asked what concerns he has with the HDW-EIS, Mr. Gordon expressed concern over the document's age. Mr. Gordon said Ecology needs documentation stating that borosilicate glass is still an adequate waste form.

  Ecology stated that they would clarify their position in writing on what supplemental information is required to support the NEPA process. This information will accompany Ecology's response to the SEPA Checklist to be completed by January 31, 1990 (Action Item 4). A status of this response will be given at the January 23, 1990 Unit Managers' meeting (Action Item 5).

Action Items: Key action items assigned during the meeting are summarized as follows:

1. Prepare and provide a draft NOD Response Table at the next Unit Managers' Meeting, scheduled for January 23, 1990. (DOE/WHC)

2. Prepare and transmit a letter detailing Ecology's intention to issue the CAA permit as part of the RCRA permit (by 12/22/89). (Ecology)

3. Submit a SEPA Checklist to Ecology by December 22, 1989. (WHC/DOE)

4. Provide a response to the SEPA Checklist by January 31, 1990. (Ecology)

5. Provide the status of an evaluation of the SEPA Checklist at the next Unit Managers' meeting (by 1/23/90). (Ecology)

6. Continue to hold HWVP status meetings on a monthly basis; the next status meeting is scheduled for the January 23, 1990. (Ecology, DOE/WHC)

S. L. Cross, DOE-RL 12/12/89

D. L. Duncan, DOE-RL 12/12/89

M. T. Gordon, Ecology 12/17/89

J. H. LaRue, WHC 12/12/89

T. M. Michelena, Ecology 12/12/89

S. M. Price, WHC 12/12/89

ATTACHMENT 1
(Agenda)

AGENDA
UNIT MANAGERS MEETING

December 12, 1989
Richland, Washington

LOCATION: Peoples Bank Building Conference Room 317

08:00 - 10:00	HWVP -NOD Comments -CAA Permit -Delay of Repository (Canister Storage) -SEPA Checklist/Options -HDW-EIS
10:00 - 10:30	616 NRDWSF -NOD Comments
10:00 - 12:00	Document Clearance Status. -AG, OCC Meeting (HAPO Building Conference Room 319)
10:30 - 12:00	Grout Treatment Facility -Comment Clarification -Drainage Media
12:00 - 1:00	Lunch
1:00 - 2:00	300 ASE, 183-H & 2727-S Closure Plans -Status -Formal Acceptance Letter
2:00 - 3:00	January 1990 UMM -Agenda -HWVP CAA Meeting -Hanford Site Permit Meeting -Finalize Meeting Minutes
3:00	Adjourn

ATTACHMENT 2
(HDW-EIS Write-up)

Attachment II

NATIONAL ENVIRONMENTAL POLICY ACT DOCUMENTATION

FOR THE

HANFORD WASTE VITRIFICATION PLANT

Completion of the Final Hanford Defense Waste - Environmental Impact Statement (HDW-EIS), satisfies the National Environmental Policy Act (NEPA) and the State Environmental Policy Act (SEPA) compliance requirements for the initiation of physical construction of the Hanford Waste Vitrification Plant (HWVP). The HDW-EIS was released in December 1987, and the resultant Record of Decision (ROD), was published April 14, 1988 (53 FR 12449). Chapter 197 of the Washington Administrative Code (WAC-197-11-610) addresses the use of NEPA documents: "(3) An agency may adopt a NEPA EIS as a substitute for preparing a SEPA EIS if (a) the requirements of 197-11-600 and 197-11-630 are met (in which case the procedures in Parts Three through Five of these rules for preparing an EIS shall not apply); and (b) The federal EIS is not found inadequate: (i) By a court; (ii) by the Council on Environmental Quality (CEQ) (or is at issue in a predecision referral to CEQ) under the NEPA regulations; or (iii) by the administrator of the United States Environmental Protection Agency under section 309 of the Clean Air Act, 42 U.S.C. 1857." A brief background of the Final HDW-EIS follows.

In accordance with the requirements of the National Environmental Policy Act (NEPA), as amended, and implementing regulations of the Council on Environmental Quality (CEQ) published in the Code of Federal Regulations as 40 CFR 1500, the Final Hanford Defense Waste-Environmental Impact Statement (HDW-EIS) was written early in the decision-making process for the disposal of Hanford defense high-level, transuranic and tank wastes.

The HDW-EIS was intended to be both a programmatic EIS (to support broad decisions with respect to the disposal strategies for the six classes of defense wastes) and an implementation EIS intended to provide project-specific environmental input for decisions on moving forward with certain disposal activities such as construction of the Hanford Waste Vitrification Plant (HWVP). In the Record of Decision (ROD) (issued on April 14, 1988 [53 FR 12449]), the decision to implement the Preferred Alternative (presented in the Final HDW-EIS) includes the design, construction, and operation of the HWVP.

The material presented in the Final HDW-EIS is sufficient for the requisite NEPA documentation for the HWVP. Material specific to the construction and operation of the HWVP was extracted from source documents (Rockwell 1985, 1987), summarized where appropriate, and used to form the basis for calculating estimates of impacts. These impacts are presented in the Final HDW-EIS, Appendix C. The impacts identified in Appendix C are aggregated with other impacts in the body of the Final HDW-EIS.

Because impacts of construction and operation are included with those of other aspects of implementing the disposal options, the relatively small impacts of the HWVP may not be recognized without reading Appendix C. In response to comments received on the draft HDW-EIS, the Final HDW-EIS

specifically states that impacts of HWVP were included in impacts given for the reference and preferred alternatives. What follows is a summary of environmental aspects related to the HWVP as they appear in the main body of the Final HDW-EIS.

DESCRIPTION AND COMPARISON OF ALTERNATIVES

Section 3.3 states that, "Most process methods and facilities are described in Appendix B. Three major facilities for use with the reference, geologic and preferred alternatives have been developed in sufficient detail to facilitate quantification of impacts for construction, operation and decommissioning." Details of glass immobilization for geologic disposal are given in Section B.1.2.2. Steps in the vitrification of waste for other alternatives are given in Sections B.2.1, B.2.3, and B.2.5.

The use of the HWVP in the geologic disposal alternative is described in Section 3.3.1.1 for existing tank waste and in Section 3.3.1.2 for future tank waste. (Note that in the geologic disposal alternative, the HWVP would require additional equipment over that described for the reference and preferred alternatives.) The use of the HWVP in the reference alternative in described in Section 3.3.3.1 for existing tank waste and in Section 3.3.3.2 for future tank waste. The use of the HWVP in the preferred alternative is described in Section 3.3.5.1 for existing tank waste and in Section 3.3.5.2 for future tank waste. Reference is made section by section to the contents of Appendix C wherein the potential impacts of HWVP are estimated.

A summary comparison of the impacts of the alternatives, including those of the HWVP, is given in Section 3.4.1.

AFFECTED ENVIRONMENT

Since the HWVP is located next to B Plant in the 200 East Area, the plant site description and the affected environment for the HWVP are the same as that presented in Chapter 4.

POSTULATED IMPACTS AND POTENTIAL ENVIRONMENTAL CONSEQUENCES

The impacts associated with implementing the alternatives that are presented in this chapter include those associated with the HWVP. Cumulative impacts from the HWVP and all the other facilities on the Hanford Site are presented in Section 5.1.4.1.

For the geologic alternative, operational impacts are given in Section 5.2.2.1, and impacts from operational accidents are given in Section 5.2.2.2. Operational accidents are also discussed in Section H.3.1 for existing tank wastes and H.3.2 for future tank wastes. The bases for these accidents and their consequences are detailed in an EIS support document (PNL 1986). Other impacts such as nonradiological pollutant emissions, resource commitments etc., for the geologic alternative, including HWVP, are given in Sections 5.2.2.3 et seq.

The impacts of not constructing and operating an HWVP are bounded by the disposal alternative of in-place stabilization and disposal and the no action alternative, as given in Section 5.3 and 5.5 respectively.

For the reference alternative, radiological consequences from routine operations are given in Section 5.4.2.1. It is noted that less than 10% of the occupational dose results from the HWVP, TGF and the WRAP combined. Radiological consequences from postulated accidents are given in Section 5.4.2.2. In parallel with the presentation for the geologic alternative, other impacts such as nonradiological pollutant emissions, resource commitments etc., including the HWVP, are given in Sections 5.4.2.3 et seq.

For the preferred alternative, radiological consequences from routine operations are given in Section 5.6.2.1. Again, the HWVP would contribute less than 10% of the occupational dose. Radiological consequences of accidents are given in Section 5.6.2.2. Other impacts such as nonradiological pollutant emissions, resource commitments etc., including those from HWVP, are given in Sections 5.6.2.3. et seq.

APPLICABLE REGULATIONS

Although individual facilities are not called out specifically, the applicable regulations cited in Chapter 6 would govern the construction, operation and decommissioning of HWVP as well as other aspects of waste disposal.

It is the DOE-RL's position that the Final HDW-EIS, written under NEPA, fulfills the requirements of SEPA for the HWVP.

References.

DOE 1987, Final Environmental Impact Statement, Disposal of Hanford Defense High-Level, Transuranic and Tank Wastes, DOE/EIS-0113, U.S. Department of Energy, Washington, D.C.

Rockwell 1985, Hanford Defense Waste Disposal Alternatives: Engineering Support Data for the Hanford Defense Waste - Environmental Impact Statement RHO-RE-ST-30P, December 1985.

Rockwell 1987, Engineering Support Data Update for the Hanford Defense Waste - Environmental Impact Statement, RHO-RE-ST-30 ADD P, February 1987.

PNL 1986, Potential Radiological Impacts of Upper-Bound Operational Accidents During Proposed Disposal Alternatives for Hanford Defense Waste, Mishima et al, PNL-5356, February 1986.